



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 11, 2015

JOHN REIDMAN, TREASURER
NEW YORK REPUBLICAN FEDERAL CAMPAIGN
COMMITTEE
315 STATE STREET
ALBANY, NY 12210

Response Due Date
06/15/2015

IDENTIFICATION NUMBER: C00055582

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. Please provide a Schedule A to support the total amount disclosed on Line 11(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A regardless of the amount. (52 U.S.C. §30104(b)(3)(B) (formerly 2 U.S.C. §434(b)(3)(B)) and 11 CFR § 104.3(a)(4)(ii))
2. Line 12 of the Detailed Summary Page of your report discloses a total of \$329,000 in transfers from other party committees. The sum of the entries itemized on Schedule A, however, indicates the total to be \$418,420. Please amend your report to clarify the discrepancy. (11 CFR § 104.3(a) and (b))
3. Schedule A, supporting Line 11(a)(i) of your report discloses apparent transfers, totaling \$64,550.69, and memos, totaling \$18,500 from "New York Majority Fund 2014," that appear to be received through joint fundraising efforts. However, "New York Majority Fund 2014" is not disclosed as a joint fundraising representative on your Statement of Organization. Please amend your Statement of Organization to disclose the joint fundraising representative or amend your report to provide clarifying information. (11 CFR §102.2)
4. Schedule A of your report discloses \$64,550.69 in memo entries from "New York Majority Fund 2014." However, it appears that these should be disclosed

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as transfers received by your committee and included in your cash on hand figures on Line 8 of the Summary Page. Please be advised that memo entries are used only to provide supplemental information on a reporting schedule. Please amend your report to correct this apparent discrepancy. (11 CFR § 104.3(a)(2))

5. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description: "FEA 100% Federal: FEA GOTV." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

6. Schedule B supporting Line 30(b) of your report discloses a payment for "FEA mail production NY24" which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions from other political committees should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page, and transfers to other party committees should be properly disclosed on a separate Schedule B, supporting Line 22 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM

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3X Instructions)

- Schedule B supporting Line 21(b) of your report discloses payments for "007 Door-to-door Get-out-to-vote" and "001 Microtargeting consultant" which appear to be disclosed on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, please be advised that Voter Identification, Generic Campaign and Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity and should be disclosed on Schedule B for Line 30(b) of the Detailed Summary Page. (11 CFR §100.24) For your next filing, please refer to the instructions for each line when determining the proper categorization(s).

- Your report discloses apparent in-kind contributions made on behalf of federal candidates. The original payments for the goods and services have been itemized as operating expenditures or other disbursements and included in the total for Lines 21 and 29 of the Detailed Summary Page.

For your information and consideration when preparing future filings, please be advised that the amount of such activity should be disclosed on Line 23 of the Detailed Summary Page so that the total amount of contributions to federal candidates (including in-kind contributions) are properly included on Line 23 of the Detailed Summary Page. (11 CFR §104.3 (b)(1)) For future filings, please refer to the Campaign Guide.

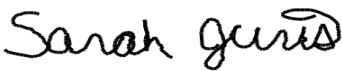
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

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Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The script is cursive and fluid, with the first name "Sarah" and last name "Juris" clearly distinguishable.

Sarah Juris
Senior Campaign Finance Analyst
Reports Analysis Division